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ATTORNEYS FOR APPELLANT KYLE LAWRENCE

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**Kyle Lawrence**

*Appellant*

**v.**

**Frost Bank**

*Appellee*

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**Appeal No. 3:19-cv-01843-X**

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**APPELLANT’S MOTION FOR EXTENSION OF DEADLINE TO FILE BRIEF**

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Appellant Kyle Lawrence (“**Appellant**” or “**Lawrence**”) files this *Appellant’s Motion for Extension of Deadline to File Brief* (the “**Motion**”), respectfully seeking an extension to file Appellant’s Brief in this matter. In support of the Motion, Appellant states as follows:

1. Contemporaneously with the filing of this Motion, Appellant filed *Appellant’s Motion for Leave to Supplement Record* (the “**Motion to Supplement**”) seeking to supplement the appellate record with transcripts of two pre-trial hearings.
2. Appellant respectfully requests that his deadline to file Appellant’s Brief in this matter be extended to a date that is 30 days following the date that the Bankruptcy

Court supplements the record pursuant to the Motion to Supplement, or December 2, 2019 – which is later.

3. As more fully described in the Motion to Supplement, the omissions in the record were inadvertent and unintentional. Immediately upon recognition of the omissions, Appellant ordered the respective transcripts on an expedited basis, and both have now been received (and were attached as exhibits to the Motion to Supplement).

4. In order to allow Appellant sufficient time to incorporate arguments related to the supplemental record, Appellant therefore respectfully requests that this Court grant him an extension as requested herein.

5. In any event, counsel for Appellant has two bankruptcy confirmation hearings; a state court appellate brief deadline; a state court hearing; and multiple bankruptcy case deadlines between now and November 4, 2019, the current deadline to file Appellant's Brief.

WHEREFORE, for the reasons cited herein, Appellant respectfully requests that this Court extend his deadline to file Appellant's Brief until the later of December 2, 2019, or 30 days following the date that the Bankruptcy Court supplements the record pursuant to the Motion to Supplement.

**DATED this 22<sup>nd</sup> day of October, 2019.**

Respectfully submitted,

**THE MITCHELL LAW FIRM, L.P.**

**/s/ Gregory W. Mitchell**

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ATTORNEY FOR APPELLANT, KYLE  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that on October 22, 2019, I communicated with Mr. M. Chad Berry regarding this Motion and the relief requested. Mr. Berry indicated that Appellee was unopposed to the relief requested.

**/s/ Gregory W. Mitchell**  
Gregory W. Mitchell  
Attorney for Appellant

**CERTIFICATE OF SERVICE**

I hereby certify that on this **22<sup>nd</sup> day of October, 2019**, the foregoing was served on all counsel of record in this matter via the Court's ECF system.

**/s/ Gregory W. Mitchell**  
Gregory W. Mitchell  
Attorney for Appellant